



***Friends of  
Congaree  
Swamp***

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BUREAU OF WATER  
WATER QUALITY DIVISION

November 23, 2007

Ms. Amy Bennett  
Bureau of Water  
South Carolina Department of Health and Environmental Control  
2600 Bull Street  
Columbia, SC 29201

Re: Proposed Revisions to Regulation 61-68, *Water Classifications and Standards*

Dear Ms. Bennett.

The Friends of the Congaree Swamp is a nonprofit 501(c)(3) corporation whose mission includes protection and restoration of the ecological systems and natural beauty of Congaree National Park. To this end, we have worked closely with SCDHEC in the past to reclassify surface waters within Congaree National Park to protect their outstanding ecological value.

We offer the following comments on the revisions proposed to Regulation 61-68, *Water Classifications and Standards*, for the Triennial Review.

We support the revisions proposed by the Department in that they will improve the water quality standards while continuing to offer protection to South Carolina's waters. The change proposed for C.10.a., removing the prohibition of mixing zones in source water protection areas, could be perceived as a weakening unless the Department ensures adequate protection of drinking water sources in the case-by-case review of new mixing zones during NPDES permitting.

After reviewing comments submitted by other stakeholders during the Triennial Review process, we are concerned that if all suggestions regarding implementation are adopted, the water quality standards could be weakened resulting in degradation of water quality and more impaired waters. Also, some suggestions may falsely indicate waters are attaining standards when they are not. Specifics of our concerns are presented below.

- The Department should retain the requirement that the geometric mean for fecal coliform be determined based on five consecutive samples in a 30-day period. Using random samples, rather than consecutive samples, could inappropriately bias the data so that it would appear the waters are meeting the standard when in fact the health of swimmers may not be protected.

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- The "tenth rule," applicable to waters which experience dissolved oxygen values below the specified numeric criterion, should be implemented as it now--at all times and not just at those times the waters are not meeting the standards. We believe the intention of this provision is to allow discharges into waters with naturally low dissolved oxygen while still protecting aquatic life. Aquatic life which is already stressed could be compromised if larger dissolved oxygen reductions were allowed during parts of the year.
- The Department should not change the prohibition for new or expanded discharges into Outstanding National Resource Waters (ONRW) or Outstanding Resource Waters (ORW). Waters within Congaree National Park were recently reclassified to ORW and one section of Cedar Creek within the Park is the State's only ONRW. We could not support any change that would jeopardize these waters.

We appreciate the opportunity to provide these comments. We also commend the Bureau of Water for its strong water quality standards program and encourage them to continue to make improvements.

Sincerely yours,

A handwritten signature in black ink, appearing to read "John M. Grego". The signature is fluid and cursive, with the first name "John" being more prominent.

John Grego, President